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9 UNITED STATES BANKRUPTCY COURT
10 NORTHERN DISTRICT OF CALIFORNIA
11 SAN FRANCISCO DIVISION

12 In re:) Case No.: 19-30088
13 PG&E CORPORATION AND PACIFIC GAS) [Chapter 11]
14 AND ELECTRIC COMPANY,) Jointly Administered
15 Debtors.) Date: May 27, 2020
16) Time: 10:00 a.m.
17) Courtroom: 17
18) Place: 430 Golden Gate Avenue, 16th Floor
19) San Francisco, California
20) Judge: Dennis Montali

21 **SUPPLEMENT TO 1) OBJECTION AND RESERVATION OF RIGHTS OF THE**
22 **CITY OF AMERICAN CANYON TO NOTICE OF PROPOSED ASSUMPTION OF**
23 **EXECUTORY CONTRACTS AND UNEXPIRED LEASES PURSUANT TO**
24 **THE DEBTORS' AND SHAREHOLDER PROPONENTS' JOINT CHAPTER 11**
25 **PLAN OF REORGANIZATION AND PROPOSED CURE AMOUNTS; AND 2)**
26 **JOINDER OF CITY OF AMERICAN CANYON IN OBJECTION TO CHAPTER 11**
27 **PLAN AND PLAN SUPPLEMENT**

28 The City of American Canyon (the "City") submits its Supplement to 1) Objection and
Reservation of Rights of the City of American Canyon to Notice of Proposed Assumption of
Executory Contracts and Unexpired Leases Pursuant to the Debtors' and Shareholders' Joint
Chapter 11 Plan of Reorganization; and Proposed Cure Amounts; and 2) Joinder of City of
American Canyon in Objection to Chapter 11 Plan and Plan Supplement.

1 1. On May 15, 2019, the City timely filed:

- 2 a. Objection and Reservation of Rights of the City of American Canyon to
3 Notice of Proposed Assumption of Executory Contracts and Unexpired
4 Leases Pursuant to the Debtors' and Shareholders' Joint Chapter 11 Plan of
5 Reorganization; and Proposed Cure Amounts [ECF Docket No. 7315]; and
6
7 b. Joinder of City of American Canyon in Objection to Chapter 11 Plan and
8 Plan Supplement [ECF Docket No. 7275];

9 The foregoing items are collectively referred to as the "Objections"

10 2. Although the City contends that it's non-consent to the releases and exculpations
11 contained in the Plan and the Plan Supplement was made clear in the Objections, in an
12 abundance of caution, and to avoid any conceivable doubt, *the City does not consent to the*
13 *releases and exculpations that the Plan seeks to ascribe to the City, without its consent,*
14 *including, but not limited to, the releases and exculpations included at Sections 10.3, 10.4,*
15 *10.5, 10.6, 10.8, 10.9, 10.11, 10.12, of the Plan and Paragraph 13 of the Plan Supplement.*
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21 Dated: May 19, 2020

REEDER LAW CORPORATION

23 /s/ DAVID M. REEDER

24 DAVID M. REEDER

25 Attorneys for the City of American Canyon
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In re
PG&E Corporation and Pacific Gas and Electric Company,
Debtors.

CHAPTER: 11
CASE NO.: 19-30088

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:

**Reeder Law Corporation
1801 Century Park East, 16th Floor
Los Angeles, CA 90067**

A true and correct copy of the foregoing document entitled (*specify* **SUPPLEMENT TO 1) OBJECTION AND RESERVATION OF RIGHTS OF THE CITY OF AMERICAN CANYON TO NOTICE OF (I) PROPOSED ASSUMPTION OF EXECUTORY CONTRACTS AND UNEXPIRED LEASES PURSUANT TO THE DEBTORS' AND SHAREHOLDER PROPONENTS' JOINT CHAPTER 11 PLAN OF REORGANIZATION AND (II) PROPOSED CURE AMOUNTS; AND 2) JOINDER OF CITY OF AMERICAN CANYON IN OBJECTION TO CHAPTER 11 PLAN AND PLAN SUPPLEMENT**)

will be served or was served in the manner stated below:

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On **May 19, 2020**, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

☒ Service information continued on attached page

2. SERVED BY UNITED STATES MAIL:

On _____, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page

3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (state method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on **May 19, 2020**, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

☒ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

May 19, 2020

David M. Reeder

/s/ DAVID M. REEDER

Date

Printed Name

Signature

In re
PG&E Corporation and Pacific Gas and Electric Company,
Debtors.

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SERVICE LIST

Service by ECF

All persons who have requested that they be added to the ECF service list in the Debtor's cases

Served by Email

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